

REMARKS

Applicants have carefully reviewed the Application in light of the Office Action mailed May 4, 2005. At the time of the Office Action, Claims 1-6, 8-30, and 32-45 were pending in the Application. The Examiner rejects 1-6, 8-30, and 32-45. Applicants have amended Claims 1, 2, 14, 26, and 38. Applicants submit that no new matter has been added with these amendments. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

Section 103 Rejections

The Examiner rejects Claims 1, 11-13, 35-37, and 43-45 under 35. U.S.C. §103(a) as being upatentable over U.S. Patent No. 5,455,855 issued to Hokari (hereinafter “*Hokari*”) in view of European Patent Publication EP 841831 A2 issued to Civanlar et al (hereinafter “*Civanlar*”) and in view of U.S. Patent No. 6,389,462 issued to Cohen et al (hereinafter “*Cohen*”). The Examiner rejects Claims 2-6, 8-10, 14-30, 32-34, and 38-42 under 35. U.S.C. §103(a) as being upatentable over *Hokari* in view *Civanlar*. Applicants appreciate the Examiner’s consideration of the application. Applicants respectfully submit, however, that the proposed combinations fail to disclose, teach, or suggest the elements recited in Applicants’ claims.

For example, Applicants respectfully submit that the *Hokari-Civanlar-Cohen* combination does not disclose, teach, or suggest the following combination of features and operations recited in Applicants’ independent Claim 1:

- monitoring communications transmitted between the untrusted device and the trusted IP telephone on the telecommunication link to ensure that the communications are media streaming to maintain the integrity of the trusted network; and
- terminating the telecommunication link if the communications transmitted between the untrusted device and the trusted IP telephone are not media streaming to maintain the integrity of the trusted network

In this and previous Office Actions, the Examiner has acknowledged that *Hokari* does not explicitly disclose media and streaming or the monitoring the type of streaming. (Office

Action, page 4). Because these features and operations are absent from the disclosure of *Hokari*, Applicants submit that *Hokari* necessarily cannot be said to disclose, teach, or suggest “terminating the telecommunication link if the communications transmitted between the untrusted device and the trusted IP telephone are not media streaming to maintain the integrity of the trusted network,” as recited in Applicants’ independent Claim 1.

The additional disclosure of *Civanlar* does not cure the deficiencies of *Hokari* identified above. While *Civanlar* discloses an “IP call set-up interface 101” and “a signaling format translator 104,” neither element operates to “[terminate] the telecommunication link if the communications transmitted between the untrusted device and the trusted IP telephone are not media streaming to maintain the integrity of the trusted network,” as recited in Applicants’ Claim 1. Rather, the IP call set-up interface 101 merely “sends and receives call setup requests” and the signaling format translator merely translates “call-setup requests into a form that the interface 101 can properly understand.” (Column 5, lines 55-57; Column 6, lines 8-11). Thus, the IP call set-up interface 101” and “a signaling format translator 104” are merely involved in the initial set up of the communication session. Even though *Civanlar* discloses that the “interface 101 monitors the status of each call establishment session and transmits error messages” (Column 6, lines 13-17), there is no indication in *Civanlar* that this “monitoring” extends beyond the initial set of the communication session.

With respect to “IP mixer 201,” *Civanlar* merely discloses that the element “performs appropriate voice encoding translation into a format compatible with the voice decoding capabilities of each receiving station as identified by the session manager 304.” (Column 7, lines 2-5). Specifically, “IP packet mixer 201 sends those packets received from the stations to the format translator 204, which then de-encapsulates and converts the IP packets into a format appropriate for the telephony bridge 202 and/or ATM/FR mixer 203.” (Column 7, lines 10-14). “Telephony bridge 202 and ATM/FR mixer 203 are mirror images of the IP packet mixer 201” and, therefore, perform similar functions. (Column 7, lines 36-37 and 49-50). Thus, the components of *Civanlar* merely operate to perform format translation for the establishment of communication sessions between terminals in communication over a plurality of networks that employ differing transmission standards. (Abstract). Applicants respectfully submit that the operations described in *Civanlar* are very different from the

features and operations recited in Claim 1. Certainly these operations do not result in the monitoring of “communications transmitted between the untrusted device and the trusted IP telephone on the telecommunication link to ensure that the communications are media streaming to maintain the integrity of the trusted network” and the termination of “the telecommunication link if the communications transmitted between the untrusted device and the trusted IP telephone are not media streaming to maintain the integrity of the trusted network,” as recited in Applicants’ Claim 1.

For at least these reasons, Claim 1 is allowable over the *Hokari-Civanlar-Cohen* combination. Therefore, Applicants respectfully request reconsideration and allowance of Claim 1.

Independent Claims 2, 14, 26, and 38 recite limitations that are similar, though not identical, to the limitations discussed above with regard to Claim 1. As just one example, Claim 2 recites “monitoring communications transmitted between the untrusted device and the trusted IP telephone on the telecommunication link to ensure that the communications are media streaming to maintain the integrity of the trusted network.” Additionally, Claim 2 recites “terminating the telecommunication link if the communications transmitted between the untrusted device and the trusted IP telephone are not media streaming to maintain the integrity of the trusted network.” Again, the Examiner relies upon the *Hokari-Civanlar-Cohen* combination for disclosure of the recited features and operations. With regard to similar features recited in Claim 1, however, Applicants have demonstrated above that the combination of references does not disclose, teach, or suggest the recited features and operations. Accordingly, for reasons similar to those discussed above with regard to Claim 1, Applicants respectfully submit that the references relied upon by the Examiner do not disclose, teach, or suggest each and every element as set forth in Applicants’ independent Claims 2, 14, 26, and 38.

Dependent Claims 3-13, 17-25, 27-37, and 39-45 depend from Claims 2, 14, 26, and 38, respectively, and incorporate the limitations of their respective independent claims. Because Applicants have shown independent Claims 2, 14, 26, and 38 to be allowable, Applicants have not provided detailed arguments with respect to Claims 3-13, 17-25, 27-37,

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and 39-45. However, Applicants remain ready to do so if it becomes appropriate. Applicants respectfully request reconsideration and allowance of Claims 3-13, 17-25, 27-37, and 39-45.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

Although no fees are believed to be due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Jenni R. Moen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6809.

Respectfully submitted,
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Date: July 13, 2005

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